



Motion and extended the deadline for the close of discovery for June 10, 2024.

6. On March 27, 2024, Plaintiff filed a Chapter 13 bankruptcy at the United States Bankruptcy Court, Western District of Pennsylvania at No. 24-10166-JCM.

7. Counsel for Plaintiff is awaiting the approval of special counsel through the bankruptcy matter in order to continue representation of Plaintiff in this matter.

8. Plaintiff and Defendant are requesting an additional sixty (60) days to complete discovery because further discovery is needed to substantiate claims and defenses asserted by the parties.

9. Plaintiff and Defendants agree to this Motion.

10. The parties do not anticipate the need for an additional extension of time to complete fact discovery.

11. The parties have attached a proposed Order.

WHEREFORE, Plaintiff and Defendants respectfully request this Honorable Court grant the requested extension to complete discovery and extend the current Case Management deadlines by sixty days.

Respectfully submitted,  
Lavery Law

DATE: June 10, 2024

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DATE: June 10, 2024

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